

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

PETRO INDUSTRIAL SOLUTIONS, LLC,

Plaintiff,

v.

ISLAND PROJECT AND OPERATING SERVICES,
LLC; VITOL US HOLDING II CO.; VITOL VIRGIN
ISLANDS CORP.; VITOL INC.; ANDREW
CANNING; and OPTIS EUROPE, LTD.,

Defendants.

CIVIL NO. 1:21-CV-00312

**AMENDED NOTICE OF RULE 30(b)(6) DEPOSITION OF
VERSA INTEGRITY GROUP INC.**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, at **4:00 p.m. AST on July 28, 2023**, counsel for Defendants Vitol Inc., Vitol U.S. Holding II Co. and Vitol Virgin Islands Corp. will take the deposition of **Versa Integrity Group Inc.** via Zoom (invite to be sent by the Court reporter) or at another place and time mutually agreeable to counsel and the witness. The topics of testimony for the Rule 30(b)(6) deposition of Versa Integrity Group Inc. are listed in Exhibit 1.

The deposition will be taken before a duly qualified notary public or other officer authorized by law to administer oaths. The deposition will be taken for the purpose of discovery, to perpetuate the testimony of the witness for use at trial, and for all other purposes permitted under the Federal Rules of Civil Procedure. The deposition will be recorded by stenographic means, audiotaped, and videotaped. The deposition will continue from day to day until completed.

Dated: July 21, 2023

Respectfully submitted,

s/ Sarah Hannigan

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Attorneys for Vitol Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this July 21, 2023, the foregoing will be served upon all counsel of record pursuant to the Court's electronic filing system and a copy will be served upon the following via email only:

Court Reporter:

Susan C. Nissman-Coursey, RMR
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Videographer:

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s/ Sarah Hannigan

Exhibit 1

Definitions and Instructions

1. “Versa,” “You,” and “Your” refer to Versa Integrity Group Inc.
2. “IPOS” refers to Island Project and Operating Services, LLC.
3. “WAPA” refers to the U.S. Virgin Islands Water and Power Authority.
4. “Lawsuit” refers to *Petro Industrial Solutions, LLC v. Island Project and Operating Services, LLC, et al.*, No. 1:21-cv-00312 (D.V.I.).

Topics

1. All tests, inspections, and reports conducted or prepared by Versa for work performed Petro Industrial Solutions, LLC or its employees at any IPOS, WAPA, or Vitol facilities from January 1, 2020 to the present.
2. Versa’s test, inspection, and reporting business, including its standard procedures and work it routinely performs.